

July 26, 2006

### **BY HAND DELIVERY**

Ms. Cully Dale Secretary/Chief Regulatory Law Judge Missouri Public Service Commission Governor Office Building 200 Madison Street Jefferson City, Missouri 65101

Re: Case No. EO-2007-0002

Dear Ms. Dale:

Attached for filing in the above-referenced case are an original and eight (8) copies of the Application to Intervene of the Missouri Industrial Energy Consumers.

Thank you for your assistance in bringing this filing to the attention of the Commission, and please call me if you have any questions.

Very truly yours,

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Diana M Vuglstike

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FILED<sup>4</sup>

JUL 2 6 2006

# Missouri Public Service Commission

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And Bryan Cave, A Multinational Partnership, London

# **FILED**<sup>4</sup>

#### BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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JUL 2 6 2006

Missouri Public Service Commission

In the Matter of Union Electric Company d/b/a AmerenUE for Authority to File Tariffs Increasing Rates for Electric Service Provided to Customers in the Company's Missouri Service Area

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Case No. ER-2007-0002

# APPLICATION TO INTERVENE OF THE MISSOURI INDUSTRIAL ENERGY CONSUMERS

Comes now Anheuser-Busch Companies, Inc., Bandwith Exchange Buildings, L.L.C., BioKyowa, Inc., The Boeing Company, DaimlerChrysler, Enbridge, Inc., Ford Motor Company, GKN, General Motors Corporation, Hussmann Corporation, JW Aluminum, MEMC Electronic Materials, Inc., Monsanto, Pfizer, Precoat Metals, Procter & Gamble Company, Nestlé Purina PetCare, Solutia and U.S. Silica Company, hereafter referred to as the Missouri Industrial Energy Consumers or "MIEC" and, pursuant to 4 C.S.R. 240-2.075, files its Application to Intervene. For its Application, the MIEC states as follows:

- 1. The MIEC is a Missouri corporation and is a group of large industrial customers of Union Electric Company d/b/a AmerenUE ("AmerenUE").
- 2. As a group of large industrial customers of AmerenUE, the MIEC's interest in this case is different than that of the general public.

3. The MIEC opposes the relief sought by AmerenUE in this case. The MIEC is continuing to review AmerenUE's filing and reserves the right to take positions on specific issues as this case proceeds.

4. The MIEC's intervention will serve the public interest by assisting the record for the Commission's decision in this case.

WHEREFORE, the MIEC respectfully requests that it be permitted to intervene, and that it be made a party to this case for all purposes.

2406440.1

Respectfully submitted,

BRYAN CAVE, LLP

By: Aliana M. Vingleteke

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Attorney for The Missouri Industrial Energy Consumers

## **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been handdelivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 26<sup>h</sup> day of July, 2006, to all parties on the Commission's service list in this case.

Klana M. Vinglitelee